

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DR. HUGH DUCKWORTH,)
Plaintiff)
v.)
R3 EDUCATION INC., f/k/a)
EIC HOLDING, INC., f/k/a)
EIC ACQUISITION CORPORATION,)
STEVEN C. RODGER, and)
TERRY J. MOYA,)
Defendants)
Case No. 1:17-cv-11169-FDS

PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Plaintiff Dr. Hugh Duckworth hereby opposes Defendants' R3 Education Inc. (f/k/a EIC Holding, Inc., f/k/a EIC Acquisition Corporation), Steven C. Rodger, and Terry J. Moya Motion to Dismiss.

Defendants' Motion relies exclusively on a document it claims is a release. As Plaintiff's Complaint makes clear, he disputes the validity of the document at issue. A memorandum of law in support of his opposition is attached hereto.

Dated:

Respectfully Submitted,

DR. HUGH DUCKWORTH,
By his attorneys,
/s/ Simon B. Mann

Simon Mann BBO# 665301
Kevin Mannix, BBO#640071
Mann Law Firm, P.C.
1071 Rt. 9 Suite 42
Framingham, MA 01701
508.270.0500
simon@sbmannlaw.com
kevin@sbmannlaw.com